

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**In re:**

**03-MDL-1570 (GBD)(SN)**

**TERRORIST ATTACKS ON  
SEPTEMBER 11, 2001**

**IRAN NOTICE OF  
AMENDMENT**

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This document relates to: *Lloyd A. Abel Sr. et al. v. Islamic Republic of Iran*,

No. 1:18-cv-11837 (GBD) (SN).

Plaintiffs file this Notice of Amendment with respect to the underlying Complaint in the above-referenced matter, ECF No. 1, as amended by ECF No. 38, as permitted and approved by the Court's Order of October 28, 2019, ECF No. 5234. Upon the filing of this Notice of Amendment, the underlying Complaint is deemed amended to add the individual(s) listed below (the "New Plaintiff(s)") as plaintiff(s) raising claims against the Islamic Republic of Iran. The underlying Complaint is deemed amended to include the allegations, as indicated below, of (a) the Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237, or (b) the Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53. The amendment effected through this Notice of Amendment supplements by incorporation into, but does not displace, the underlying Complaint. This Notice of Amendment relates solely to the Islamic Republic of Iran and does not apply to any other defendant.

Upon filing this Iran Notice of Amendment, each New Plaintiff is deemed to have adopted all factual and jurisdictional allegations of the complaint that has been joined as

specified below; all causes of action contained within that complaint; all prior filings in connection with that complaint; and all prior Orders and rulings of the Court in connection with that complaint.

Additionally, each New Plaintiff incorporates the factual allegations and findings contained in those pleadings and orders filed at Havlish v. Bin Laden, No. 1:03-CV-9848 (GBD)(SN) (S.D.N.Y.), ECF Nos. 263, 294, 295; In re Terrorist Attacks on September 11, 2001, 03-MDL-1570 (GBD)(SN) (S.D.N.Y.), ECF Nos. 2430, 2431, 2432, 2433, 2473, 2515, 2516; and evidence submitted at the proceedings before the Honorable George B. Daniels on December 15, 2011 (ECF No. 2540).

### CAUSES OF ACTION

Each New Plaintiff hereby adopts and incorporates herein by reference all factual allegations, jurisdictional allegations, and jury trial demand, including all causes of action against Iran, as set forth in the following complaint [**check only one complaint**]:

- ☐ Federal Insurance and Ashton Plaintiffs' Amended Consolidated Complaint Against Defendant, the Islamic Republic of Iran, ECF No. 3237
- ☒ Amended Complaint, Burnett v. Islamic Republic of Iran, No. 15-CV-9903 (GBD)(SN) (S.D.N.Y. Feb. 8, 2016), ECF No. 53

**IDENTIFICATION OF NEW PLAINTIFFS**

Each New Plaintiff is or was a survivor of a person who died due to the terrorist attacks of September 11, 2001. For each New Plaintiff, the following chart lists the New Plaintiff's name, the New Plaintiff's residency and nationality, the name of the New Plaintiff's deceased family member, the New Plaintiff's relationship to the decedent, and the paragraph(s) of the underlying Complaint discussing the decedent and/or the decedent's estate.

	<b>New Plaintiff's Name (alphabetical by last name)</b>	<b>New Plaintiff's State of Residency at Filing (or death)</b>	<b>New Plaintiff's Citizenship/ Nationality on 9/11/2001</b>	<b>9/11 Decedent's Name</b>	<b>New Plaintiff's Relationship to 9/11 Decedent</b>	<b>Paragraphs of Complaint Discussing 9/11 Decedent</b>
1	Philip Aversano as Personal	NY	United States	Louis F. Aversano, Jr.	Sibling (Deceased)	Line 16
2	Philip Aversano	NY	United States	Louis F. Aversano, Jr.	Sibling	Line 16

Dated: January 10, 2020

Respectfully submitted,  
/s/ Jerry S. Goldman

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**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the *Lloyd A. Abel Sr. et al. v. Islamic Republic of Iran* Plaintiffs' Notice of Amendment was filed electronically this 10<sup>th</sup> day of January, 2020. Notice of this filing will be served upon all parties in 03 MDL 1570 and 1:18-cv-11837 (GBD)(SN) by operation of the Southern District of New York's Electronic Case Filing ("ECF") system, which all parties may access.

New York, NY  
January 10, 2020

/s/ Jerry S. Goldman  
Jerry S. Goldman, Esq.